**UNITED STATES DISTRICT COURT**
**WESTERN DISTRICT OF WISCONSIN**

| | |
|---|---|
| ECOLAB Inc., and NALCO COMPANY, LLC d/b/a Nalco Water, an Ecolab Company and/or Nalco Water,<br><br>        Plaintiffs,<br><br>v.<br><br>JESSICA GRAILER,<br><br>        Defendant. | No. 3:23-cv-00102 |

**DECLARATION OF JACK ANDERSON**

I, Jack Anderson, hereby declare as follows:

1.      I am over the age of 18 years old and do not suffer from any disabilities which would prevent me from giving and understanding this Declaration based on my personal knowledge.

2.      I have personal knowledge of the facts set forth in this Declaration and could competently testify to them under oath if called as a witness.

3.      Ecolab, Inc. ("Ecolab" or the "Company") employs more than 40,000 associates.

4.      I am currently employed by Ecolab as a Lead Security Engineer on Ecolab's Global Information Security team.  Among other things, the Global Information Security team supervises and maintains Ecolab employees' log data.

5.      Through the discovery process, Ecolab was asked to pull the audit log data from Microsoft Office 365 for former employee Jessica Grailer.

6.      Ecolab utilizes a software tool named Elastic Search, which continuously collects data from Microsoft Office 365 and Azure for Ecolab employees and preserves the data in the Elastic Search database.

FP 48049130.3

7.      Given that Ecolab currently employs more than 40,000 employees, the Elastic Search helps Ecolab securely store Microsoft Office 365 and Azure data relating to employee file activity.

8.      The data associated with Grailer's Microsoft Office 365 account was preserved in the Elastic Search database.

9.      To compile the data in the audit log produced to Grailer on August 16, 2023, ("Grailer Audit File"), Ecolab ran a query through Elastic Search to download all Microsoft Office 365 audit data relating to Grailer for the period of January 8, 2023, through January 18, 2023.

10.      The only filter used to limit the data was a time filter to restrict the data to the above time period.  Ecolab did not otherwise limit Grailer's audit log data as provided in the Grailer Audit File.

11.      The Grailer Audit File also contains metadata relating to how Elastic Search ingested Grailer's Microsoft Office 365 data.

I declare under penalty of perjury that the foregoing is true and correct.

_Jack Anderson_
Jack Anderson (Aug 28, 2023 10:40 CDT)
_____
Jack Anderson

Aug 28, 2023
_____
Date

# Declaration of Jack Anderson - Response to Motion to Compel re Audit Logs. V2(48049130.3)

Final Audit Report                                              2023-08-28

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## "Declaration of Jack Anderson - Response to Motion to Compel re Audit Logs. V2(48049130.3)" History

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